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June 5, 2015

**VIA E-MAIL TRANSMISSION  
AND ECF FILING**

The Honorable Robert E. Gerber  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.  
Case No. 09-50026 (REG)**

**Letter Regarding Update on Related Proceedings**

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. Pursuant to Your Honor’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM’s Motions to Enforce. Specifically,

1. On each of June 1, 2015 and June 2, 2015, the parties submitted a Joint Case Status Report to the court in *State of Arizona v. General Motors LLC*, No. CV2014-014090 (Sup. Ct. Arizona). On June 4, 2015, the Superior Court of Arizona entered an order (“**Arizona Order**”) continuing the stay in the action. Copies of the two Reports (without exhibits<sup>1</sup>), and the Arizona Order are annexed hereto as Exhibits “1” to “3” respectively.

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<sup>1</sup> The exhibits to the Reports are this Court’s (i) *Decision on Motion to Enforce the Sale Order* (“**Motion to Enforce Decision**”) [Dkt. No. 13109]; (ii) *Decision re Form of Judgment* [Dkt. No. 13162]; (iii) *Order re Technical Matters Concerning Judgment* [Dkt. No. 13163]; (iv) *Judgment* entered in connection with the Motion to Enforce Decision [Dkt. No. 13177]; and (v) *Order, Pursuant to 28 U.S.C. § 158(d), and Fed.R.Bankr.P. 8006(e), Certifying Judgment for Direct Appeal to Second Circuit* [Dkt. No. 13178]. As each of these documents have already been filed in this bankruptcy case, they are not included as attachments hereto.

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2. On May 6, 2015, the plaintiff (“**Pillars Plaintiff**”) in *Pillars v. General Motors LLC*, Case No. 1:15-cv-11360-TLL-PTM (E.D. MI.) filed a motion to remand (“**Remand Motion**”) in the United States District Court for the Eastern District of Michigan. On May 26, 2015, New GM filed a brief in opposition (“**Opposition**”) to the Remand Motion, and on June 2, 2015, the *Pillars Plaintiff* filed a reply to New GM’s Opposition. Copies of these pleadings are annexed hereto as Exhibits “4” to “6” respectively.<sup>2</sup>
3. Today, June 5, 2015, counsel to New GM and Lead and Liaison Counsel filed a joint letter (“**Joint Letter**”) addressed to Judge Furman to advise on matters of possible significance in proceedings related to MDL 2543, which includes an update on the status of this bankruptcy case. A copy of the Joint Letter, without exhibits,<sup>3</sup> is attached hereto as Exhibit “7.”

Respectfully submitted,

/s/ Arthur Steinberg

Arthur Steinberg

AJS/sd  
Encl.

cc: Edward S. Weisfelner  
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<sup>2</sup> The *Pillars Plaintiff* filed a no stay pleading with this Court on May 28, 2015. *See* Dkt. No. 13166. New GM will be filing its response thereto on Monday, June 8, 2015.

<sup>3</sup> There are 18 exhibits annexed to the Joint Letter, most of which are documents that have previously been filed with this Court; the other documents do not appear relevant to this bankruptcy case. To the extent the Court believes the exhibits should be filed, New GM will do so promptly.